U.S. Department of Justice

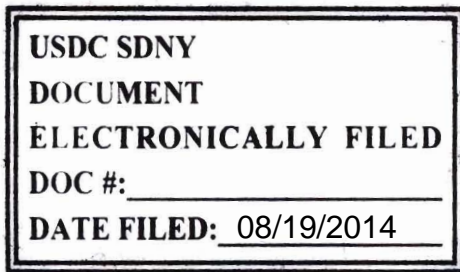USDC SDNY
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United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 19, 2014

The conference scheduled for August 20, 2014, is hereby ADJOURNED to September 16, 2014, at 4:15 p.m.

SO ORDERED.

August 19, 2014

The Clerk of Court is directed to terminate Docket No. 1096.

BY ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square, Room 2202
New York, New York 10007

Re: United States v. Alimzhan Tokhtakhounov, et al., 13 Cr. 268 (JMF)

Dear Judge Furman:

         The Government respectfully requests that the Court so order the enclosed stipulation and orders between the United States and (1) Charles Pacheco; (2) Tatyana Guza; (3) ViMASS LLC; and (4) Hare Nichols Segal & Brint, LLC, resolving those persons' and entities' third party claims to assets covered by preliminary orders of forfeiture entered by the Court in this matter.

         In addition, the Government has reached agreements in principle with Boris Vaksman and Nicholas Schulman, the two remaining parties who filed third party petitions in this matter, on a resolution of their claims. The parties are currently finalizing the terms of stipulations effecting those resolutions, and anticipate submitting them to the Court in the near future. Accordingly, the parties believe that the conference scheduled for tomorrow at 3:30pm to address the third party petitions is no longer necessary, and request that it be adjourned *sine die*, pending submission of stipulation and orders between the remaining parties.

                                        Respectfully submitted,

                                        PREET BHARARA
                                        United States Attorney

                              By: */s/ Alexander Wilson*
                                        Alexander Wilson
                                        Assistant United States Attorney
                                        (212) 637-2453

cc: All counsel of record (via ECF)
         Scott Cox, Esq., *counsel for ViMASS LLC* (via email)
         Joseph Nichols (via email)